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June 7, 2006

Mr. Stephen Johnson, Administrator
U.S. Environmental Protection Agency
Ariel Rios Building, 1101-A
1200 Pennsylvania Ave., N.W.
Washington, DC 20460

Subject: Public comments on the HPV Test Plan for 4,4'-methylenebis-(2-chlorobenzenamine)

Dear Administrator Johnson:

The following comments on the MBOCA Consortium's test plan for the chemical 4,4'-methylenebis-(2-chlorobenzenamine) are submitted on behalf of the Physicians Committee for Responsible Medicine, People for the Ethical Treatment of Animals, the Humane Society of the United States, the Doris Day Animal League, and Earth Island Institute. These health, animal protection, and environmental organizations have a combined membership of more than ten million Americans.

The consortium submitted its test plan on Dec. 27, 2005, for the chemical 4,4'-methylenebis-(2-chlorobenzenamine), also known as MOCA and/or MBOCA (CAS No. 101-14-4). This chemical is used as a curing agent in the manufacture of castable polyurethane products. The MBOCA Consortium used a combination of existing and modeled data to fill almost all SIDS endpoints for physicochemical properties, environmental fate, ecotoxicity, and health effects of MOCA. At this time, we strenuously object to the consortium's proposal to conduct a combined repeated dose/reproductive/developmental toxicity study (OECD 422) on a chemical that has been classified as a carcinogen since the early 1970s.

Although no standard reproductive/developmental studies have been conducted with MOCA, data from extensive cancer studies can be used to assess the hazard potential of this material. At least nine studies have been conducted with rats, mice, and dogs to determine the effects of chronic exposure to MOCA, with some animals dosed throughout their lifespan. Additional animal studies conducted with a known or suspected human carcinogen to merely fill a missing SIDS endpoint (repro/dev toxicity) is a stark example of "check-the-box" toxicology. This compound is used and currently regulated with the full knowledge that it is a carcinogen. The potential reproductive/developmental effects of this chemical in animals will not alter its regulation nor further protect humans and is a waste of both animals and resources.

Efforts to minimize animal testing in the HPV program do not appear to have been taken seriously by the consortium. The animal reduction measures set forth by the EPA in the *Federal Register* (December 2000) state that HPV participants "may conclude that there is sufficient data, given the totality of what is known about a chemical, including human experience, that certain endpoints need not be tested." It seems this is the exact situation where this principle should be followed.

Thank you for your attention to these comments. I may be reached at 202-686-2210, ext. 327, or via e-mail at *meven@pcrm.org*.

Sincerely,

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Research Analyst

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